

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

United States of America,

Plaintiff,

vs.

Case No. 20-cr-20233

Honorable Bernard A. Friedman

D-1 JOHN HENRY RANKIN, III,  
D-2 DR. BETH CARTER,  
D-3 DR. ROBERT KENEWELL,  
D-4 DR. JASON BRUNT,  
D-5 DR. JOHN SWAN,,  
D-6 JEAN PINKARD, NP,  
D-7 TONI GREEN, NP,  
D-8 FITZGERALD HUDSON,  
D-9 VIRENDRA GAIDHANE,  
D-10 MAKSUDALI SAIYAD, R.PH,  
D-11 ADENIYI ADEPOJU, R.PH,  
D-12 ALI SABBAGH, R.PH,  
D-13 ROBERT KING,  
D-14 JERMAINE HAMBLIN,  
D-15 SONYA MITCHELL,  
D-16 LAVAR CARTER,  
D-17 ROBERT LEE DOWER, JR,  
D-18 DENISE SAILES,  
D-19 DEWAYNE BASON,

Defendants.

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**Government's Third Forfeiture Bill of Particulars**

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The United States of America, by and through its counsel, submits  
this Third Forfeiture Bill of Particulars pursuant to Rule 7(f) of the

Federal Rules of Criminal Procedure to supplement and clarify the forfeiture allegations contained in the Indictment (ECF No. 1), the First Forfeiture Bill of Particulars (ECF No. 171), and the Second Forfeiture Bill of Particulars (ECF No. 173), and to provide notice of specific property the Government intends to forfeit upon conviction.

Upon conviction of the offenses in violation of 21 U.S.C. §§ 841 and 846 as alleged in the Indictment, the convicted defendant(s) shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a): (a) any property, real or personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of such violation(s); and (b) any property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation(s), including but not limited to the following:

1. Springfield Armory XDS 9mm Handgun, Ser No: S3647116, with 9mm Magazine and Eight (8) Rounds of 9mm Ammunition; and
2. Charter Arms Bulldog .44 Caliber Handgun Ser No: 939658 with Five (5) Rounds of .44 Caliber Ammunition.

It is the intent of the United States to seek to forfeit any other property of the defendant(s) as substitute property, up to the value of

the forfeitable property as described above, pursuant to 21 U.S.C.

§ 853(p), as incorporated by 18 U.S.C. § 982(b) and/or 28 U.S.C. § 2461.

Respectfully submitted,

MATTHEW SCHNEIDER  
United States Attorney

s/ Michael El-Zein  
Michael El-Zein  
Assistant United States Attorney  
211 W. Fort Street, Suite 2001  
Detroit, MI 48226  
(313) 226-9770  
[michael.el-zein@usdoj.gov](mailto:michael.el-zein@usdoj.gov)  
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Dated: November 10, 2020

**CERTIFICATION OF SERVICE**

I hereby certify that on November 10, 2020, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which will electronically serve all ECF participants.

s/ Michael El-Zein  
Michael El-Zein  
Assistant United States Attorney  
211 W. Fort Street, Suite 2001  
Detroit, MI 48226  
(313) 226-9770  
[michael.el-zein@usdoj.gov](mailto:michael.el-zein@usdoj.gov)  
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